

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA : 1:14CR364-1
 :
 v. :
 :
 MELVIN RAIMUND PAUL : FACTUAL BASIS

NOW COMES the United States of America, by and through Ripley Rand, United States Attorney for the Middle District of North Carolina, and as a factual basis under Rule 11, Fed. R. Crim. P., states the following:

On September 1, 2013, the Akron Market in Winston-Salem, North Carolina was robbed. A clerk working in the store described the robber as six feet tall, 160 pounds, wearing a black tank top, gray pants and brown work boots and something dark in color covering his head and face.

The clerk was in the back of the store restocking a cooler when the robber approached him with what appeared to be a black/chrome pistol. The robber said to the clerk "give me the cash." The clerk then walked to and opened the cash register. The robber said "give me all the money now." The clerk gathered up the cash and handed it to the robber. The robber left the store through the front door. An audit revealed the robber left with \$833.00.

The clerk told Winston-Salem Police (WSPD) Officers that someone matching the description of the robber had entered the store about two hours before the robbery. WSPD detectives were able to determine from surveillance footage that the customer who entered the store two hours prior to the robbery was the same person who robbed the store. He was wearing the exact same clothes and had the exact same tattoo as the robber on his right arm. Utilizing a mug shot database, detectives determined that the robber was MELVIN RAIMUND PAUL (PAUL). Detectives sent photographs of PAUL to all WSPD Officers in an attempt to locate him.

On September 6, 2013, the Pop Shoppe convenience store located in Greensboro, North Carolina was robbed. One of the clerks described the robber as a black male about 6'0" tall, stocky build, bald, light scruff for facial hair and in his 20s to early 30s. The robber came into the store with a black towel around his head. The robber was wearing a white T-shirt, black shorts that were longer than regular shorts and tan work boots.

The robber walked around the chip rack and approached the counter. At this point, the robber pulled a plastic bag from his waist band and put the bag on the center of the counter. The robber then told the clerk to give him the money and to hurry up and he was not joking. Initially, the clerk thought the robber was joking. Then the robber pulled out what appeared

to be a black handgun from his waistband. The clerk then began putting money in the bag. The robber asked the clerk if he had any guns behind the counter. The clerk told him no, and handed him the money. The robber then left out the front door. An audit revealed the robber took \$120 from the business.

On September 10, 2013, the Akron Market in Winston-Salem was robbed again by the same individual. The clerk was inside the business mopping the floor. The front doors were locked.

The clerk saw a tall, dark complexion black male standing outside the business at the front door. The clerk knew immediately that the individual was there to rob the business because he had a black shirt over his head and a black rag or bandanna over his face. The robber grabbed the door to pull it open, and the clerk yelled to him, "No, it's locked".

The robber then pulled hard on the front doors, forcing the left side off the frame, and entered the business. The robber walked up to the employee entrance side of the counter and said "give me all the money". The robber had a black handgun and a gray plastic bag. The robber made the clerk remove the money from the register and place it into the bag. The robber then said "I'm sorry I have to do this to you, Ma'am," and fled the business on foot. The robber stole \$120.00 from the business.

On September 14, 2013, at approximately 3:40 a.m., the Fast Track convenience store on University Parkway in Winston-Salem

was robbed. A black male walked to the door of the business wearing a dark grey/black tank top, grey jogging pants and tan boots. The robber also had a black shirt draped over his head and he was holding a white t-shirt to his face.

The robber asked the clerk if they had any Advil. The clerk said that they did and went back inside the store to get it. As the clerk went back inside the store, the robber put his foot between the door and the door frame, but did not enter the store. Once the clerk approached the counter with the Advil, the robber pulled out what appeared to be a small black handgun from the waistband of his pants and said "come up off of it." The robber threw a plastic CVS bag at the clerk. The clerk opened the cash register and put \$1 bills and \$5 bills in the bag. It was later determined that \$30 was taken from the business. The clerk handed the bag to the robber, and the robber left the store on foot.

Later that same day, September 14, 2013, at approximately 11:17 am the Al-Pawn Shop in High Point, North Carolina was robbed. The robber was described by the clerk as being a black male, in his late 20s or early 30s wearing a white t-shirt, pants and a black towel over his head. Before the robbery, the robber had been browsing in the store and asked about different laptops. The clerk and the robber then went to the back of the

store. At this point, the clerk and the robber were the only ones in the store.

The robber then approached the cash register with a bag that he had brought into the store. The robber then pulled what appeared to be a pistol from his waistband with his right hand and pointed it at the clerk. The robber said "give me the money in the register." The robber spoke in a quiet voice, and the clerk had difficulty hearing him. The robber then said "this isn't a game."

The clerk took cash from the register and placed it into the robber's bag. The robber then left the store on foot. The total amount of money taken was \$214.00.

As the robber left the store, a second clerk followed the robber out of the store. The robber casually walked to a silver Lexus RX300 that was parked at the corner of Dallas St. and Montlieu Ave. At this point, the second clerk saw Officer Robertson of the High Point Police Department (HPD). The clerk motioned to the car, and Officer Robertson attempted to make contact with the car.

PAUL was the driver. There was a female passenger later identified as Sharmia Hagler. At this point, PAUL began a chase with law enforcement that did not end until PAUL was in Forsyth County and stopped by Forsyth County Sherriff's Office (FCSO) Deputies, who used a vehicle pursuit maneuver to get PAUL to

stop. PAUL's vehicle crashed into a tree. A black Crossman pellet pistol was located in the passenger floorboard. \$45.00 in U.S. currency was also located in the center console of the car.

After his arrest, PAUL was advised of his Miranda rights by Winston-Salem Police Department (WSPD) Detectives. PAUL waived his rights and agreed to speak with detectives. PAUL confessed to committing all of the above robberies. PAUL said that he used the black pellet pistol that was found in his car in all of the robberies.

All of the businesses that PAUL robbed were engaged in interstate commerce.

This the 3rd day of December, 2014.

Respectfully submitted,

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MELVIN RAIMUND PAUL : CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of December, 2014, the foregoing was filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Gregory Davis, Assistant Federal Public Defender

Respectfully submitted,

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